

BRUCE A. BLAKEMAN
County Executive



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COUNTY OF NASSAU
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February 11, 2025

Via ECF

Honorable Brian M. Cogan
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kahlon v. County of Nassau, et al.
Docket No. 24-CV-02439 (BMC)

Your Honor:

This office represents defendant County of Nassau (the "County") in the above-referenced matter. The purpose of this letter is to respond to Docket Entry # 43, which is Defendant/Counterclaimant Celine Boulben's February 3, 2025 letter motion for attorney fees and request to retain supplemental jurisdiction, as well as to concur with Plaintiff Yossef Kahlon's February 7, 2025 Letter (Docket Entry # 45) requesting that the Court remand the entire action to the New York State Supreme Court in and for the County of Nassau.

There appear to be no remaining federal claims in this action. The federal court has discretion whether to retain jurisdiction of the state law claims, or to remand them to the New York State Supreme Court. Of course, Defendant County defers this decision to the Court. If, however, this Court decides to remand, we would like to point out that under C.P.L.R. §504(1), the place of trial for all actions against Nassau County shall be in the New York State Supreme Court in and for the County of Nassau located at 100 Supreme Court Drive, Mineola, New York 11501.

As to the remaining disputes between Plaintiff and co-defendant Celine Boulben, the County takes no position.

As always, Nassau County thanks Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney

cc: (via ECF)
All counsel of record